

NEW JERSEY OFFICE
QUAKERBRIDGE EXECUTIVE CENTER
101 GROVERS MILL ROAD, SUITE 200
LAWRENCEVILLE, NJ 08648
TEL: (609) 720-0400
FAX: (609) 720-0457

LEVY KONIGSBERG, LLP
ATTORNEYS AT LAW
605 THIRD AVENUE, 33RD FLOOR
NEW YORK, NY 10158

TEL: (212) 605-6200
FAX: (212) 605-6290

WWW.LEVYLAW.COM

ALBANY OFFICE
90 STATE STREET
ALBANY, NEW YORK 12207
TELEPHONE: (518) 286-5068

mshock@levylaw.com

Direct: 212-605-6233

June 29, 2023

Via ECF

The Honorable Vernon S. Broderick
United States District Court – Southern District of New York
40 Foley Square, Room 518
New York, NY 10007

Re: C.M. v. The Madison Square Boys and Girls Club, Inc.
1:20-cv-00751-VSB
Joint Status Letter

Dear Honorable Judge Broderick:

Please accept this joint status letter on behalf of Plaintiff C.M. and Defendant Madison Square Boys & Girls Club, Inc. (“Madison,” and jointly with C.M., “the parties”) in this matter.

On June 29, 2022, Madison filed a voluntary petition (the “Petition”) for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Southern District of New York, and on July 6, 2022, Madison filed a Suggestion of Bankruptcy on the docket in this action. *See* ECF Doc. 40. Pursuant to section 362 of the Bankruptcy Code, the commencement or continuation of a judicial, administrative, or other action or proceeding against Madison was stayed upon the filing of the Petition.

By Order dated October 6, 2022, (ECF Doc. 43), Your Honor requested that the parties file a joint letter providing a status update as to whether the automatic stay should be lifted on or before January 3, 2023 and every 90 days thereafter. The parties now submit this joint status letter to inform the Court that the parties’ view is that this action should continue to be stayed in light of the ongoing proceedings taking place under the supervision of the Bankruptcy Court.

Respectfully submitted,

LEVY KONIGSBERG, LLP

FRIEDMAN KAPLAN SEILER ADELMAN &
ROBBINS LLP

/s/ Matthew J. Shock
Matthew J. Shock, Esq.
605 Third Avenue
New York, NY 10158
(212) 605-6200
mshock@levylaw.com
Attorneys for Plaintiff
C.M.

/s/ Bonnie M. Baker
Bonnie M. Baker, Esq.
7 Times Square
New York, NY 10036
(212) 833-1100
bbaker@fklaw.com
Attorneys for Defendant
Madison Square Boys & Girls Club, Inc.

Cc: All counsel of record (*via ECF*)